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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,)	Case No. 3:16-CR-00051-BR-09
)	
Plaintiff,)	
)	MEMORANDUM IN SUPPORT OF
vs.)	DEFENDANT'S MOTION FOR HEARING
)	RE: DISCOVERY MANAGEMENT,
JASON PATRICK,)	PRESERVATION OF EVIDENCE AND FOR
)	PROVISION OF DEFENSE ACCESS TO
Defendant)	CRIME SCENES
)	

The defendant has filed with the Court a Discovery Request and a Request to the United States requesting the preservation of any and all crime scene evidence and for allowing the defense access to any such crime scenes.

Due to the number of defendants, the size and location of the crime scenes, and the ongoing and volatile nature of the events which have occurred and are occurring at the Malheur National Wildlife Refuge ("MNWR"), defendant seeks the assistance of the Court in fashioning an appropriate Order or Orders regarding the preservation and recordation of crime scene evidence and for allowing defense access thereto.


The Court has inherent authority under Federal Rules of Criminal Procedure 2, and 16 to manage discovery practices and procedures in this case to ensure the proper and orderly

MEMO IN SUPPORT OF DEFENDANT'S MOTION FOR HEARING: RE DISCOVER MANAGEMENT...

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administration of justice. *United States v. Cervantes*, N.D. Cal. May 24, 2013 WL 22999622, *United States v. W.R. Grace*, 526 F.3d, 499, 509-12 (further citation omitted.)

Respectfully submitted this 11th day of February, 2016.



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